

# **EXHIBIT F**



"Ford, Rebecca (CIV)"  
<Rebecca.Ford@usdoj.gov>

01/04/2008 05:17 PM

To "Tina M. Tabacchi" <tmtabacchi@JonesDay.com>

cc

bcc

Subject RE: Deposition Dates for Goode and Lucas

Tina,

I just returned your call. Per my message, if you are still in the office and we can discuss these issues today, please call me. Alternatively, I would appreciate it if we could make time to speak on Monday morning. I can be available anytime that morning except 10:00-11:00 a.m. EST.

Thanks,

Becky  
(202) 514-1511

-----Original Message-----

From: Tina M. Tabacchi [mailto:tmtabacchi@JonesDay.com]

Sent: Friday, January 04, 2008 4:28 PM

To: Ford, Rebecca (CIV)

Subject: Deposition Dates for Goode and Lucas

Becky --

I tried to call you this afternoon to talk about the logistics for providing you with deposition dates. Please feel free to let me know if you have suggestions/preferences or there is another person you have assigned to coordinate this (and I will confess that I am looking for that opportunity myself). For now, we will provide you dates as soon as we have them on a rolling basis. We are making an effort to group together witnesses in the same location, where possible. It would also be helpful to know if there are witnesses you expect can be completed in less than a full day for us to know and we can try to schedule two in one day to expedite the process and reduce travel for all. We would appreciate it if you could let us know as soon as possible whether you wish to confirm a date or there is a conflict so that we can let the witness know/use the date for another witness if feasible. Thanks. TMT

Trudi Lauer Goode  
Day, Chicago

Wednesday, January 16

Jones

Doris Roach-Lucas  
&  
Daniels LLP

Thursday, January 31

Baker

96th Street, Suite 600

600 E.

Indianapolis, IN 46240

(Embedde Tina M. Tabacchi

d image 77 W. Wacker Drive, Chicago, IL 60601-1692 \* Direct:

moved to 312.269.4081 \* Fax: 312.782.8585 \* tmtabacchi@jonesday.com

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Jones

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Tina M. Tabacchi/JonesDay  
Extension 54081

To Rebecca.Ford@usdoj.gov  
cc jgwinchester@jonesday.com  
bcc

01/08/2008 07:05 PM

Subject Additional Deposition Dates for Alternate Site Personnel

Becky --

We can offer the following additional dates for depositions of the Alternate Site Sales Personnel DOJ has requested:

John Moran	January 22 or 23	Las Vegas, NV (TBD)
Frank Genuardi	January 23 or 24	Houston, TX (Jones Day)
Kaye Jessup	January 30	Dallas, TX (Jones Day)
Jeani Lee Haines	January 30	Nashville, TN (TBD)
Molly Loughman	February 15	Columbia, SC (TBD)
Harold Harsh	February 19	Pittsburgh, PA (Jones Day)
Deborah Drake	February 19	San Francisco, CA (Jones Day)
Mike Ramsey	February 27	Kansas City, MO (TBD)
Daryl Miser	February 28	Kansas City, MO (TBD)
Martine Bance-Cadichon	March 20	Chicago, IL (Jones Day)

Please let us know by COB tomorrow if you wish to confirm the previously offered date of January 16 for Trudi Goode (Chicago) and at your earliest convenience whether you wish to confirm the previously offered date of January 31 for Doris Roach-Lucas (Indianapolis).

We again invite your suggestions on ways to streamline this process (e.g. scheduling shorter depositions/more than one deposition per day, etc.).

TMT



**Tina M. Tabacchi**

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tmtabacchi@jonesday.com

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**Tina M. Tabacchi/JonesDay**  
Extension 54081

To Rebecca.Ford@usdoj.gov  
cc jgwinchester@jonesday.com  
bcc

01/10/2008 05:08 PM

Subject Fw: Additional Deposition Dates for Alternate Site Personnel

Becky --

We can offer the following additional dates for depositions of the Alternate Site Sales Personnel DOJ has requested:

Dave Zackowski      February 21      Charlottesville, VA

I understand that you plan to send me an email confirming a number of dates we have offered. To the extent that we have been able to secure a location for a deposition in a City where we do not have an office, we will let you know.

Per our discussion today, we will request an alternative date for Ms. Goode. We understand that DOJ does not intend to proceed with her deposition next week.

Finally, as we discussed today, we have not been able to speak with Lisa Kassek-Weiss because she is on family medical leave.

TMT



**Tina M. Tabacchi**

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tmtabacchi@jonesday.com

----- Forwarded by Tina M. Tabacchi/JonesDay on 01/10/2008 01:18 PM -----



**Tina M. Tabacchi/JonesDay**  
Extension 54081

To Rebecca.Ford@usdoj.gov  
cc jgwinchester@jonesday.com

01/08/2008 07:05 PM

Subject Additional Deposition Dates for Alternate Site Personnel

Becky --

We can offer the following additional dates for depositions of the Alternate Site Sales Personnel DOJ has requested:

John Moran	January 22 or 23	Las Vegas, NV (TBD)
Frank Genuardi	January 23 or 24	Houston, TX (Jones Day)
Kaye Jessup	January 30	Dallas, TX (Jones Day)
Jeani Lee Haines	January 30	Nashville, TN (TBD)
Molly Loughman	February 15	Columbia, SC (TBD)
Harold Harsh	February 19	Pittsburgh, PA (Jones Day)
Deborah Drake	February 19	San Francisco, CA (Jones Day)
Mike Ramsey	February 27	Kansas City, MO (TBD)
Daryl Miser	February 28	Kansas City, MO (TBD)

Martine Bance-Cadichon

March 20

Chicago, IL (Jones Day)

Please let us know by COB tomorrow if you wish to confirm the previously offered date of January 16 for Trudi Goode (Chicago) and at your earliest convenience whether you wish to confirm the previously offered date of January 31 for Doris Roach-Lucas (Indianapolis).

We again invite your suggestions on ways to streamline this process (e.g. scheduling shorter depositions/more than one deposition per day, etc.).

TMT



**Tina M. Tabacchi**

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**Tina M. Tabacchi/JonesDay**  
Extension 54081

01/25/2008 01:11 PM

To Rebecca.Ford@usdoj.gov

cc

bcc

Subject Updated Deposition Chart

***Becky -- I left you a voicemail a bit ago. I have attached an updated chart reflecting additional information/dates/witnesses. We have provided dates for all current Hospira employees with the exception of Paul Lozano (who has previously been deposed/we are waiting to hear from) and Lisa Kassak-Weiss who is on FML. We have provided you dates for those former Hospira employees we have been able to locate and contact, and continue our efforts to locate and contact the remaining former Hospira employees. Thanks. TMT***

***PS I have also attached the chart in pdf format in case that is easier for you.***

Witness	Proposed Date	DOJ Accept	Abbott Confirm	Location	Contacts	
John Moran	1/23/08	Yes	Confirmed	Las Vegas, NV USAO 333 Las Vegas Blvd. South Suite 5000 Las Vegas, NV	JD: Mark Demonte <a href="mailto:mdemonte@jonesday.com">mdemonte@jonesday.com</a> DOJ:	
Kaye Jessup	1/30/08	Yes	Confirmed	Dallas, TX Jones Day	JD: Gary Lewis <a href="mailto:gilewis@georgeandbrothers.com">gilewis@georgeandbrothers.com</a> DOJ:	
Jeani Lee Haines	1/30/08	Yes	Confirmed	Nashville, TN Bass, Berry & Sims 315 Deaderick Street Suite 2700 Nashville, TN	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	
Doris Roach-Lucas	1/31/08	Yes	Confirmed	Indianapolis, IN Baker & Daniels	JD: Mark Demonte <a href="mailto:mdemonte@jonesday.com">mdemonte@jonesday.com</a> DOJ:	
Angeline Massaro	2/07/08	Pending	Pending	Washington, DC Jones Day	JD: DOJ:	N
Frank Genuardi	2/13/08**	Pending	Pending	Houston, TX Jones Day	JD: Gary Lewis <a href="mailto:gilewis@georgeandbrothers.com">gilewis@georgeandbrothers.com</a> DOJ:	**
Aaron Rayford	2/13/08	Yes	Confirmed	Atlanta, GA Jones Day	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	
Craig Smith	2/13/08**	Pending	Pending	Houston, TX Jones Day		** co If an (p
Molly Loughman	2/15/08	Yes	Confirmed	Columbia, SC Haynsworth Sinker Boyd 1201 Main Street 22nd Floor Columbia, SC	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	
Harold Harsh	2/19/08	Yes	Confirmed	Pittsburgh, PA Jones Day	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	

Deborah Drake	2/19/08	Yes	Confirmed	<b>San Francisco, CA</b> Jones Day	JD: Jeremy Cole <a href="mailto:jpcole@jonesday.com">jpcole@jonesday.com</a> DOJ:	
Dave Zackowski	2/21/08	Yes	Confirmed	<b>Charlottesville, VA</b> TBD	JD: Carol Geisler <a href="mailto:cgeisler@jonesday.com">cgeisler@jonesday.com</a> DOJ:	
John "Doug" McGill	2/27/08	Pending	Pending	<b>Atlanta, GA</b> Jones Day	JD: DOJ:	
Mike Ramsey	2/27/08	Yes	Confirmed	<b>Kansas City, MO</b> Shook, Hardy & Bacon 2555 Grand Boulevard Kansas City, MO	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	
Daryl Miser	2/28/08	Yes	Confirmed	<b>Kansas City, MO</b> Shook, Hardy & Bacon 2555 Grand Boulevard Kansas City, MO	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	
Mark Szewczyk	3/4/08*	Pending	Pending	<b>Massillon OH Area</b> Location TBD, Host Firm		Ne *A lin Be
Matt Strassner	3/05/08	Yes	Confirmed	<b>Chicago, IL</b> Jones Day	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	
Trudi Lauer Goode	3/07/08	Yes	Confirmed	<b>Chicago, IL</b> Jones Day	JD: Carol Geisler <a href="mailto:cgeisler@jonesday.com">cgeisler@jonesday.com</a> DOJ:	
Dennis Kelly	3/07/08	Yes	Confirmed	<b>Hartford, CT</b> Shipman & Goodwin One Constitution Plaza Hartford, CT	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	
Ron Blackwell	3/18/08	Pending	Pending	<b>Raleigh, NC</b> Smith Moore 2800 Two Hannover Square Raleigh, NC	JD: Jeremy Cole <a href="mailto:jpcole@jonesday.com">jpcole@jonesday.com</a> DOJ:	Ne
Gary "Keith" Aldy	3/19/08	Pending	Pending	<b>Folsom/Sacramento, CA</b> Location TBD, Host Firm	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	Ne
Martine Bance -Cadichon	3/20/08	Yes	Confirmed	<b>Chicago, IL</b> Jones Day	JD: DOJ:	
Scot Steenolson	3/21/08	Pending	Pending	<b>Los Angeles, CA</b> Jones Day	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	Ne Da wi
Jomal McNeal	3/26/08	Pending	Pending	<b>Los Angeles, CA</b> Jones Day	JD: Jeremy Cole <a href="mailto:jpcole@jonesday.com">jpcole@jonesday.com</a> DOJ:	
Diana Young	3/28/08	Pending	Pending	<b>Detroit, MI</b> Location TBD, Host Firm	JD: Gabe Scannapieco <a href="mailto:gscannapieco@jonesday.com">gscannapieco@jonesday.com</a> DOJ:	Ne
Julie Less	Pending	Pending	Pending	<b>San Diego, CA</b> Jones Day	JD: Jeremy Cole <a href="mailto:jpcole@jonesday.com">jpcole@jonesday.com</a> DOJ:	N T C D
<i>Michael Flynn</i>						F c a e
<i>Lisa Kassek-Weiss</i>						W



Deborah Paulson						
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AltSiteDepChart.pdf



**Tina M. Tabacchi**

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